

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Seth A. Goldberg, Esq,**
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, Pennsylvania 19103
*Attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Huahai U.S., Inc.,
Prinston Pharmaceutical Inc., and Solco Healthcare US, LLC (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Baohua Chen, Chairman, President, and General Manager of Zhejiang Huahai Pharmaceutical Co., Ltd., on May 31 through June 2, 2021, at 7:00 a.m. Hong Kong time (May 30 through June 1, 2021, at 7 p.m. eastern time), and continuing until completion, at Duane Morris LLP, 30 South 17th Street, Philadelphia, Pennsylvania 19103, via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will be provided.

TAKING ATTORNEY FOR PLAINTIFFS:

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

April 15, 2021

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/Adam M. Slater
ADAM M. SLATER
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EXHIBIT A

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Baohua Chen.
2. The complete production of Baohua Chen's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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